

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,)	
)	
Plaintiff, Counterclaim Defendant,)	
)	C.A. No. 2:19-cv-05030 JDW
v.)	
MIDDLE EAST FORUM,)	
DANIEL PIPES (individually), and)	
GREGG ROMAN (individually),)	
)	
Defendants, Counterclaim Plaintiffs.)	

**MOTION FOR ADMISSION *PRO HAC VICE*
OF MARGARET M. DIBIANCA, ESQ.**

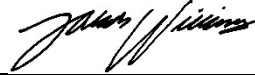
Pursuant to Local Rule of Civil Procedure 83.5.2(b), Defendant Gregg Roman, acting through his undersigned attorney, a member of the Bar of this Court, hereby move for the admission *pro hac vice* of Margaret M. DiBianca, Esq., to practice in this Court for the conduct of this case. In support thereof, Defendant Roman and the undersigned state as follows:

1. The undersigned counsel, Jakob Williams, Esq., is admitted to practice before this Court and is in good standing.
2. The undersigned counsel hereby certifies that he knows that Margaret M. DiBianca, Esq., is a member in good standing of the state and federal courts referenced in the Applicant's Statement and that the Applicant's private and personal character is good.
3. Margaret M. DiBianca, Esq., has executed an Affidavit and an "Applicant's Statement," attached hereto which includes the information sought by the Clerk of this Court regarding *pro hac vice* admissions.
4. This Motion, attachments, and the proposed order were served on counsel for the Plaintiff via ECF.

5. The office address and phone number of the undersigned counsel who files this Motion is: Clark Hill PLC, Two Commerce Square, 2001 Market Street, Ste. 2620, Philadelphia, PA 19103, (215) 640-8500.

6. The formal name, signature, attorney identification number, and admission to the Bar of this Court of the undersigned counsel who files this Motion is as follows:

Jakob Williams, Esq.



Sponsor's Name

Sponsor's signature

Admission date: January 13, 2021

Attorney ID No. 329359

WHEREFORE, Defendant Roman respectfully requests this motion be granted, that Margaret M. DiBianca, Esq., be admitted to this Court *pro hac vice* to represent him in this matter, and the Court issue the proposed Order submitted with this Motion.

CLARK HILL PLC

/s/ Jakob Williams

Jakob Williams, Esq. (PA Bar No. 329359)

Two Commerce Square

2001 Market Street, Ste. 2620

Philadelphia, PA 19103

P: (215) 640-8500

F: (215) 640-8501

[Jfwilliams@clarkhill.com](mailto:jfwilliams@clarkhill.com)

Dated: September 24, 2021

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,)	
)	
Plaintiff, Counterclaim Defendant,)	
)	C.A. No. 2:19-cv-05030 JDW
v.)	
MIDDLE EAST FORUM,)	
DANIEL PIPES (individually), and)	
GREGG ROMAN (individually),)	
)	
Defendants, Counterclaim Plaintiffs.)	

**DECLARATION OF MARGARET M. DIBIANCA, ESQ.,
IN SUPPORT OF MOTION TO PRACTICE IN THIS COURT
PURSUAN TO LOCAL RULE OF CIVIL PROCEDURE 83.5.2(b)**

I, Margaret M. DiBianca, having been sworn, states as follows:

1. I am currently admitted to practice, am active and in good standing, in the following state and federal jurisdictions:

<u>Court</u>	<u>Admission Date</u>	<u>Attorney I.D. Number</u>
Supreme Court of the State of Delaware	December 17, 2004	DE Bar No. 4539
District of Delaware	January 13, 2005	DE Bar No. 4539

2. I have never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which I have been a member.

3. I certify that I have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and agree to be bound by both sets of Rules for the duration of this case for which *pro hac vice* admission is sought.

4. If granted *pro have vice* status, I will in good faith continue to advise counsel who has moved for the *pro hac vice* admission of the current status of the case for which *pro hac vice* has been granted and of all material developed herein.

CLARK HILL PLC



Margaret M. DiBianca, Esq. (Bar ID 4539)
824 N. Market Street, Ste. 710
Wilmington, DE 19801
Phone: (302) 250-4748
Email: mdibianca@clarkhill.com

Dated: September 24, 2021

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,)	
)	
Plaintiff, Counterclaim Defendant,)	
)	C.A. No. 2:19-cv-05030 JDW
v.)	
MIDDLE EAST FORUM,)	
DANIEL PIPES (individually), and)	
GREGG ROMAN (individually),)	
)	
Defendants, Counterclaim Plaintiffs.)	

**APPLICANT’S STATEMENT FOR ATTORNEY SEEKING TO
PRACTICE IN THIS COURT PURSUANT TO
LOCAL RULE OF CIVIL PROCEDURE 83.5.2(b)**

I, Margaret M. DiBianca, the undersigned, am an attorney who is not currently admitted to either the bar of this Court or the bar of the Supreme Court of Pennsylvania, and I hereby apply for admission to practice in this court pursuant to Local Rule of Civil Procedure 83.5.2(b), and will pay for the \$40.00 admission fee by credit card upon the filing of this Statement.

A. I state that I am currently admitted to practice in the following state jurisdiction:

<u>Court</u>	<u>Admission Date</u>	<u>Attorney I.D. Number</u>
Supreme Court of Delaware	December 17, 2004	DE Bar No. 4539

B. I state that I am currently admitted to practice in the following federal jurisdictions:

<u>Court</u>	<u>Admission Date</u>	<u>Attorney I.D. Number</u>
District of Delaware	January 13, 2005	DE Bar No. 4539
Third Circuit Court of Appeals	April 26, 2010	DE Bar No. 4539

C. I state that I am at present a member of the aforesaid bars in good standing, and that I will demean myself as an attorney of this court uprightly and according to the law, and that I will support and defend the Constitution of the United States.

D. I am entering my appearance on behalf of Defendant Gregg Roman.

CLARK HILL PLC



Margaret M. DiBianca, Esq. (Bar ID 4539)
824 N. Market Street, Ste. 710
Wilmington, DE 19801
Phone: (302) 250-4748
Email: mdibianca@clarkhill.com

Dated: September 24, 2021

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,)	
)	
Plaintiff, Counterclaim Defendant,)	
)	C.A. No. 2:19-cv-05030 JDW
v.)	
MIDDLE EAST FORUM,)	
DANIEL PIPES (individually), and)	
GREGG ROMAN (individually),)	
)	
Defendants, Counterclaim Plaintiffs.)	

ORDER

AND NOW, on this _____ day of _____, 2021, it is hereby
ORDERED that the Motion of Defendant Gregg Roman for the admission *pro hac vice* of
Margaret M. DiBianca, Esq., to practice in this Court for the above-captioned matter pursuant to
Local Rule of Civil Procedure 83.5.2(b) is **GRANTED**.

BY THE COURT:

United States District Judge

CERTIFICATE OF SERVICE

I, Jakob Williams, Esquire, hereby certify that on September 24, 2021, the foregoing document was served via electronic filing upon the following counsel:

Seth D. Carson, Esq.
Catherine W. Smith, Esq.
Derek Smith Law Group, PLLC
1835 Market Street, Ste. 2950
Philadelphia, PA 19103
seth@dereksmithlaw.com
catherine@dereksmithlaw.com

Jonathan R. Cavalier, Esq.
Leigh Ann Benson, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103
jcavalier@cozen.com
lbenson@cozen.com

Sidney L. Gold, Esq.
William Rieser, Esq.
Leanne Lane Coyle, Esq.
Traci M. Greenberg, Esq.
Sidney L. Gold & Associates, PC
1835 Market Street, Ste. 515
Philadelphia, PA 19103
sgold@discrimlaw.net
brieser@discrimlaw.net
lcoyle@discrimlaw.net
tgreenberg@discrimlaw.net

/s/ Jakob Williams

Jakob Williams, Esq.